Charles TalberT
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A set a see
TRU State Road
Phila. Pa. 19136 September 22, 2019
United States District CourT
Ringulusmas 7 tristed as
Charles Talbert Civil Action
ν ₅
Dr. Schneider No. 18-5112-MRK
Dr. Patel
D. Shellenberget
D. Shellenberger A. Horne
Dr. Taylor
Dr. Fawler
Dr. Lisco
Dr. Lisco Dr. Reynolds Final Amended ComplainT
Lo Parties
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tedt Eleitash beensel icensed dentists that
are contracted by the PDP to provide immates dental
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tast toot Election of the bearing as the that
is contracted by the PDP to provide inmates medical
Services.
4. A. Horne, is a licensed registered norse that is con-
tracted by the RDP to provide inmates medical services.
5. Dr. Taylor, Dr. Fowler, Dr. Liser, and Dr. Reynolds, Are All
Treased psychiatrist contracted by the PDP to provide
mental beauth services to inmates.
b. Defendants are sied individually and in their official
RUE Industas Cross 200122ino bas des tos of plicages
- Zwal large state Latel ou tadt Pice radrestase d
11. State And Federal LAWS
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(A) Risca Pelicies.
(B) Health Care Facilities Acta
C) Penasylvania Administrative Code.
(0) The Dental Law.
(EIMental Health Procedures Act
(F) First Amendment-Retaliation
(G) Four teenth Amendment:
(1) 200 process
(HIT the XII of the Civil Rights Act of 1964
111. Statement of Chains - Dental
B. Between September 2018, And September 2019, Schneider And
Patel had a contractual duty, under state and Federal
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stuggeradt baa, skilasus 19, pasy rams die betautie
services in Accordance with state and federal laws.
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tadt zeitivas (8); Eriager bebesa tadt diest aedera (8): ER
needed Cillings; (C) decayed teeth that required aneathetic
Exercise ai mag partaisurs (a) baa; Enoit satus lazo
. Coit selai betaelqui as mort esere
10. Dr. Schneider and Dr. Patel were aware of his Aforesaid
enral testicas through various sich call request forms
and unproductive trips to their clinic.
11. Through these unpreductive wisits, sich call requests,
and prior lawswite Schneider and Patel were also
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12. This phobia, bowever, was not considered in the commence ment, and foregoing determination of Plaint H's treatment plan, which white plant the distributions to ge
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pinn, which sithmatery caused liams the conditions to go
2 this act and conission by Schoelder and Patel School Send El
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excepted shoodard of care as follows: (a) Caring & treat Plantifue a manner in accerdance (a) Caring & treat Plantifue and many the with the safe prevailing in the
dental community
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Think and steeth while Plaintiff was notices and Patels As a direct and proximate result of Schoelder and Patels Actionate indifference and negligence, Plaintiff was Subject to: Subje
and is teeth while Plaintiff was asleep. At the a direct and proximate result of Schoeider and Patels Actionate indifference and negligence, Plaintiff was Subject to: Sub
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dure sone continuent trained inserving products and a trained inserving products to the service of the continuent of the
treated infection and decayed treth. (B) Enfering from difficulty in eating and cheming, eardinal upset restausness and entiety, and a general loss of enjayment of like. (C) howing to incur simposial colligations for subtree deatal core and treatment that was required to be given by Defendants while under their immediate care. by Defendants while under their immediate care. 15. Schneider and Batel additionally deprived Plaintiff any entitioistics or pain medication for a year, with Batel entitionally providing adays worth in April of acid, cally when Plaintiff pulled out one of his own teeth humself. Count One-Prison Policy Level accorporates by reference the statements made in paragraphs 1. Is as therefore at the herein at length. It sixto policy as a statement of the statement of the statement of the seath of t
Experience to see the sold of the side of the seed of
enchanal upset carversness and anxiety, and a condition of serveral loss of enjoyment of life. General loss of enjoyment of life. Care and treatment that was required to be given covered to be given that was required to be given by Defendants while water their times at the care can appear that the care and Pater and Pater and Pater and Pater and Pater and private of this own teeth himself. Can't One Prison Palicy Count One Prison Palicy The Plaintiff accorporates by reference the statement owned to and entire and the paragraphs of the statement of the carbon paragraphs. The Paragraphs of the statement of the carbon paragraphs and the carbon teeth of the carbon paragraphs. The Paragraphs of the statement of the carbon paragraphs and the carbon the carbon paragraphs. The Paragraphs of the carbon t
enchanal upset carversness and anxiety, and a condition of serveral loss of enjoyment of life. General loss of enjoyment of life. Care and treatment that was required to be given covered to be given that was required to be given by Defendants while water their times at the care can appear that the care and Pater and Pater and Pater and Pater and Pater and private of this own teeth himself. Can't One Prison Palicy Count One Prison Palicy The Plaintiff accorporates by reference the statement owned to and entire and the paragraphs of the statement of the carbon paragraphs. The Paragraphs of the statement of the carbon paragraphs and the carbon teeth of the carbon paragraphs. The Paragraphs of the statement of the carbon paragraphs and the carbon the carbon paragraphs. The Paragraphs of the carbon t
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care and treatment that was required to be given by Descadants while under their immediate care. Let Descadants while under their immediate care. Let Descadant while under their five Allantist and Paintist and Paintist and Paintist and Paintist and Paintist paint one of his own teeth himself. Count One Prison Palicy Le Plantist acorporates by reference the statement made in paragraphs it is a town to the the herein at length. The Paragraphs is a state of the services of Exercitive and Paintist and Paragraphs. The Paragraphs is a state of the services of Exercitive and Paintist and Paragraphs.
by Detendants while under their insulations of the Schools of the Bod of the
15. Schneider and latel additionally deprived Plaintiff and Antibiatics as pain medication for a year with latel Only providing to days worth in April at 2019, caly when Plaintiff pulled out one of his own teeth himself. Count One Prison Policy Chance the statement of the statement of the statement of the property
antibistics or pain medication for a year with latel only providing 7 days worth in April of Sing Long when Plantiff pulled out one of his own teeth himself. Count One-Prison Policy Count One-Prison Policy Whinield was property by reference the statement of made in paragraphs 1-15 as the statement of the paragraphs of the statement of the policy of the statement of the state
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Plaintiff pulled out one of his own teeth himself. Count One-Prison Palicy Low Raintiff accorporates by reference the statements and endingly. Low Raintiff accorporates by reference the statement of the paragraphs of the country of the person of the country. Low Raintiff accorporate of the statement of the country of the country of the country.
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when an innates illness has been determined to re-
quire those services."
18. Beth Schneider And Patel were clearly AWARE of Bointiffs'
- chabia of needles as a forementioned, through an extensi
tesupos las deserge es noitestios bladinan oui
Los Aid Schrift had latel disternabled this place of the A. P.
teilassa las en of stiels friend boss of been sured to the trained to several to the several to
a celles a biarla etarita and sentennos de sections

20. This careless disregard and Pailure to provide a referral
BO before is the direct and proximate cause of the
20. This careless discepted and failure to provide a referral as before is the direct and proximate cause of the pain and suffering in which Plaintiff endured for A
11 = 11 4
Toniago zoval zid ni tusmopuje zbnamsk Hitmall, IROTIRTHLA
Schneider and Patel in an amount in excess at 500,000,000
WHEREFORE Plantiff demands judgment in his laws against Schneider and Patel in an amount in excess of 500,000.00. conpensatory and punitive damages, costs, fees, and interest.
Count Two-Pa. Admin. Code 1 Dental Law
25 26 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2
ai show storestotes sit some server and estores made in
PATAGEARDS 1-20 AS though set forth herein At length.
"Ironging ball withing " WI'll railord show and but the Pass
states: Facilities and supplies for the dental service shall
be such as to Fester effective and timely patient care.
- Equipment instruments and supplies in the dental service
shall be at the same high quality as is required by
GENERALLY ACCEPTED STANDARDS OF JEATAL PRACTICE."
23 As Afresaid, Schneider and Patels LACK of Anesthesia was
centered on the reason why they failed to Ester to
Plaintiff effective and timely care as required by accepted
standards of dental practice.
24. Pursuant to Admin Code Section 33. 211 " Superfessional Condict"
Subsection (a) (3) (4) (5) (7) And (6) And The Dental Law 63
P.S. section 123.1 (G)(S) it atates: "it will be deemed to be
enprofessional conduct when A dentist: (3) delegates to A
person duties that the dentist knows or bas reason to know
the person is not competent to perform or not outhorized
to perform; (4) withdraws dental services ofter a dentist
at ladt as badeildates assa and gidenoitals tostag
Antest is usable to abtain secessary dental care in A
A police i Znail Abanamassa interpretarion to tasting to
bilian current intertion-control recommendations issued
by the Federal Centers for Disease Control; and (5)
Eniling to provide necessary dental care to a patient
sht Consider 25 1990 st 70 720000 plant a oi
est to the need for the CATE."
25. As Aforesaid, Schneider and Patel ande false statements
in regards to them being Able to treat Plaintiff by ACES. thesia; bad interfered and ceased all offsite dental re-
thesia; bad interfered and coased all offsite dental ie-
14 too to it is specialists as sent to in 212: but
bors suizzioneils on Pitaral? Cotisque disposition plant on the tongo

Swans Tellas of bad failed to control and there after remove
the infection within his system, and failed to provide
the referral for treatment in which they could of provided
WHEREFORE, Plaintiff demands judgment against Schneider and
Polal is a sure of is an account to the sure of the su
Patel in an amount in excess of \$500,000, compensatory
And punitive damages, costs, fees, And interest.
Count Three First Ameadwent
26. Plaintiff incorporates by reference the statements made in
paragraphs 1-25 as though set les the herein at langth.
teningo tivadal A baltes ban balit Hilaial , binesonla et T.S.
Correctional lateral Estaisonal lateral Landing
required treatment
sund letal has religioned that trialgrows toward and late
denied Plaintiffs requests for affisite anesthetic and
Essansing bon chicaunt roing out to notheless on progress
- 679 20W didw, 224 PROLICE TIGHT POR WORL FORES POR
near la Alifaint Berings yllandition 1 sold band Sold of pain
29. DENNELASE AND INTELL HOCH HOLD WAS A SEPTIMED THAT OF PAIN
Eliveual Eid to nothilater ai notasibem notosini ban
and grisvages
LUNESEFORE, Plaintiff Armands judgment somnet Schneider and
Patel in an amount in excess of & 500,000,00, compensatory
etagratin but , 2397 , etaus , 23 pamale suiting bue.
Count Four-Fourteenth Amendment
The Process And Equal Protection
30. Plaint I in corporates by reference the statements made in
all wast to rise and At 158 for the co PS-1 Edna 200
paragraphs 1.29 as though set forth herein At length
casities or needed extractions
Ti paisd collose to rest pailqqira a bad asla Advise se
29 How R stille on cid
33 All three issues were serious, as they all were diagnosed
25 Section to the section of the partition of the section of the s
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Hit and I said to season a side and Parte while Plaintiff was pre-
with demined to me sore britain or commit million
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1272432 bad Pitain19 tant would latel bas rake Hide EE
infected teeth that caused bun pain, and binew that
Printed bad a phobia, yet, still denied win a referral.
WHEREFORE, Plaintitt Leannads judgment against Tchneider
' and Patel in an amoint in excess of \$600,000,000,
LIMEREFORE, Plaintiff demands judgment negativest Schneider to Bod Patel in an Amount in excess of 600,000,000, compensatory and prairie damages, cost, fees, and interest.
IV. Statement of Claims-Medical
36. Plaintiff was admitted At CECF on or about January
10, 2019
17. Dr. Sagreiga, and Dr. M. Hague have prescribed Plaintitt
Flexeril muscle-relaxants for approximately sight (8)
Hears for a known acute and chronic lower-back
Mails betained (5) out Atim mid test distant
38.After a thorough examination of Plaintiffs lower back
condition on January 1974 and February 2774, 204 by Dr.
Haque be determined by employing professional judgment
that Plaintif required prescriptions for Flereril due to
his severe muscle spasms that affected his daily
- Couting
39. On March 1 2019 Plaintiff and Shellenberger Fell into A
verbal altercation about the treatment he required for
his cloudted unite blood cells, and cholesteral I trigly
cerides levels
40.Ms. Shellenberger, at no time during this altercation, had done any evaluations of Plaintiffs lower-back con-
ATTE
at Harrier List at Shall as person as bring to retaliste
41. However, due to Shellenberger wishing to retaliate and proish Plaintiff for verbally disrespecting her she scught to intentionally and malicipally cause Plaintiff
Fitnish Science Wilson Las allon the Attack
source made sonzana Los sonzana sain bu
discortinging Plaintiffs order for Flexeril-
yd, nieg pantaiserses bar zanzagz sisem sesses yd point pantasses discontinus Plaintinia com containtasses dit. St. dtim podentusmos tesdim shan com containtasses dit. St.
Dr. Hague, the prescriber, which violates acrowal stradard
- Proceduce
43 Shallon orace foiled to evaluate Plaintite lover back con-
23670 Lefterall painting discorting plaintiffs order
of Flexeril without first acquiring consent by the
Elitains Enishies tradition bas postor decing Plaintits
extensive history of being prescribed Flexeril in moting
dition he fore wrong fully discontinuing Plaintiffs order of Flexeril, without first acquiring consent by the of Flexeril, without first acquiring consent by the prescribing doctor, and without considering Plaintiffs extensive bistory of being prescribed Flexeril in motions the affects hid decision to discontinue which demonstrates

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practice or standard.
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with any his smaller intestine
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46 For this complication, several Consen employees had
ot muibonni 25, Simer Laper Lager Anide Les innodium to
slew up the bowel movements; which also helped to
prevent Accidental bowel werements while sleep.
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to noit ailator in 7272 to ElogIA bon & bog IA otion
Invisits Filed against Carizon employees and personal
bad Edmon (2) suit plataminorgan rot sorroll stillie
deprived Plaintiff his order for anti-diarrhea medi-
sidelistassau Pitaiala sevas planstastas et sais
And repetitive bowel movements.
bedisseng zid etim Aldrial swiking ton pot wood sarett. 34
bas, azzzw bisow asitibass ZPitoial I tadt, asitasiban
cause him to wake up daily in his awa feres.
49. By Pailing to gravide Plaintit medication that was pre-
scribed by wedical dectors for his serious digestive
condition demonstrates a substantial departure from
accepted professional judgment, practice, and standard.
50. The nots and omissions of Shellenberger, and Horne, shows
that both named medical befondants deviated from the
accepted standard of CATE AS Follows:
car failing to treat Plaintiff in a manner in accordance
sit in politices of medical care prevaling in the
medical health community.
Aties paired retain pleesland mand minter se pailing (3)
established required treatment.
51. As A direct and proximate result of the aforementioned,
Plaintiff was subject to:
IA) AD Adverse impact on his lower back and digestive
- Roshikass
(B) SUPPERING FROM SOURCE MUSCLE JASME And SOURCE
goli stidu ztnemetom Isional lettenship accidental baies sono
(c) emotional uset nervousness and noviety and a gene-
ral lass of enjoyment of life.
Count One-Prison Policy

52. Plaintiff incorporates by reference the statement made in
thought to these test so it is english
53. 10 prison policy 4. E. 5 it states: "Medications will be
issied as prescribed by health services staff. Medi-
yd (bot verteai ea) 29tanai at bozageih od liw enother
certified practitioners"
54. As almementioned both Sitellenberger and Horne had a con-
teactual duty per prison policy, to make sure Plaintiff tool
received his Flexeril and lawed was as presched and as
instructed by medical doctors with an extensive and
more Accurate medical judgment of Plaintitts conditions.
55. However, both Shellenberger and Horne breach the afare-
said prison policy by carelessly and maliciaesly depriving
and discontinuing prescribed medication.
WHEREFORE, Plaintiff demands judgment against Shellenberger
and there in an amount in excess of 500,000.00, compensating
and punitive damages, costs, fees, interest.
Count Two - Health Care Facilities
Act-Administrative Code
•
56. Plaintiff incorporates by reference the statements made in
paragraphs 1-55 as though set forth at length.
paragraphs 1-55 as though set forth at leagth. 57. Pursuant to the Health Care Facilities Act (35 8.5. subsection
paragraphs 1-55 as though set forth at leagth. 57. Pussiant to the Health Care Facilities Act (35 P.S. subsection 448.101-448.964) And Pa. Admin. Code Section 101.4, "organ-
paragraphs 1-55 as though set forth at leagth. 57. Pursuant to the Health Care Facilities Act (35 P.S. subsection 448.101-448.904) and Pa. Admin. Code Section 1014, "organ- ized medical staff" is defined as a formal organisation
paragraphs 1-55 as though set forth at leagth. ST. Piesi ant to the Health Care Facilities Act (35 P.S. Silvection ST. Piesi ant to the Health Care Facilities Act (35 P.S. Silvection 445.101 - 445. 904) by B. B. Bamio. Code Section 101.4 P. argan- 100 Teams of the Section
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paragraphs 1-55 as though set forth at leagth. The health Care Facilities Act (35 8.5. Suisection The health Care Facilities Act (35 8.5. Suisection The health of the
paragraphs 1-55 as though set forth at leagth. 57. Pirsiant to the Health Care Facilities Act (35 8.5. subsection 448.101-448.904) and Pa. Admin. Code Section 1014, "organ- 448.101-448.904) and Pa. Admin. Code Section 1014, "organ- ised medical staff" is defined as a formal organisation of physicians. with the delegated responsibility and authority to maintain proper standards for medical care. As As Abresaid, the acts and omissions of Shellenberger and Horne Jemonstrates that the diagnosis; care, and treat
paragraphs 1-55 as though set forth at leagth. 57. Pirsi ant to the Health Care Facilities Act (35 8.5. sinsection 948.161-448.964) and Ba. Admin. Code Section 101.41 argan- 13.61 medical staff" is defined as a formal organisation 13.61 medical staff" is defined as a formal organisation 13.62 medical staff is about the delegated respectivities and 13.63 as a forestated the acts and conscious to solventy or and 13.63 as a forestates that the diagnosis, care, and treat 13.63 as a forestates that the diagnosis, care, and treat 14.65 as a forestates that the diagnosis, care, and treat 15.65 as a forestates that the diagnosis, care, and treat 15.65 as a forestates that the diagnosis, care, and treat 15.65 as a forestates that the diagnosis contains a forestates that the diagnosis are a forestates the diagnosis are a forestates that the diagnosis are a forestates that the diagnosis are a forestates the diagnosis and diagnosis are a forestates that the diagnosis are a forestates the diagnosis and diagnosis are a forestates and diagnosis are a forestates
paragraphs 1-55 as though set forth at leagth. 57. Pursuant to the Health Care Facilities Act (35 8.5. subsection 448.101 - 448.904) and Ba. Admin. Code Section 101.4, "organ- 12ed medical staff" is defined as a formal organisation 12ed medical staff" is defined as a formal organisation 12ed medical staff" is defined as a formal organisation 12ed medical staff and respect and substantial sar medical care 12ed to mointain proper standards for medical care 12ed to mointain proper standards for medical care 12ed to mointain and the diagnosis; care, and treat- 12ed to medical staff and was therefore denied
paragraphs 1-55 as though set forth at leagth. 57. Pursuant to the Health Care Facilities Act (35 8.5. subsection 448.101 - 448.904) and Ba. Admin. Code Section 101.4, "organ- 12ed medical staff" is defined as a formal organisation 12ed medical staff" is defined as a formal organisation 12ed medical staff" is defined as a formal organisation 12ed medical staff and respect and substantial sar medical care 12ed to mointain proper standards for medical care 12ed to mointain proper standards for medical care 12ed to mointain and the diagnosis; care, and treat- 12ed to medical staff and was therefore denied
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paragraphs 1-35 as though set forth at length. 57. Parsant to the Health Care Facilities het (35 8.5) subsection 57. Parsant to the Health Care Facilities het (35 8.5). 948. 101. 448. 964) and length and section 1914. 4. 200 and 1918. 200 and 200
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entagraph of the Medical seed toot to the all length of the Health Care Facilities het (35 8.3. 20.10.20). The peral to the Health Care Facilities het (35 8.3. 20.10.20). The peral to the peral of the peral has a control of the peral of
altipost to dispost sed descriptions of the Heart Sacrice of the description of the Heart Sacrice of the Heart Sac

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42213 subsection (d) of the Medical Practice hat of 1955
noising got suit saids delide containes staplumang lade
and personal direction required by the standards of
Acceptable medical practice.
61. In Section 432.13 subsection (6), it states that Shellenberger
shall not independently prescribe or dispense drogs, and
therefore canact discontinue them independently
WHESEFORE, Signiff demands judgment against Shellenberger
and Horne in an amount in excess of 500,000,00, compen-
satery and piniture damages, costs, fees, and interesta
Count Three-First Amendment
neithlightion
of shaw states sit some for some the statements made in
FACAGEARNS 1-61 AS though set Set the herein of length
63. As dorementioned, die to personal distitle, werbal afterca-
tions (protected speech) and the Sting of grievances and
LAWSETS, was the motivating facts of
CALL THE ZERANDET SE VOICE POLICIONAL PROTECTION CALL CALL
needed for Plaintitts series zweet back condition.
ZAW tadt noitesilon And mail - itan painings be sont (A)
needed for Plaintiffs server digestive condition.
13/222 des les ternings to surply 2 Banash Africal 9, 3807 383741CA
and Herne in an appoint in excess of 500,000,000,000
pensatery and punitive damages, costs, free, and interest.
Court Four teenth Amendment
Due Process - Equal Protection
in spew ztramateta she sperage to corporates by reference the statements made in
paragraphs 1-63 as though set forth herein at length.
paragraphs 1-63 as though set forth herein at leagth. paragraphs 1-63 as though set forth herein at leagth. 65. As aforementioned Shellenberger and Horne were grossly. negligent and deliberate indifferent to Plaintiffs serious back and digestive medical conditions by their nets and conissions Aforesaid.
negligent and deliberate indifferent to Plaintitts serious
back and digestive medical conditions by their nots and
cmissions Aftersaid.
LE Cher marges similarly situated with lower back
you their Flexeril and Immediate of their Flexeril without and
their Flexeril and louncedium as ardered without any
intervention or problems from Shellenberger or Horne.
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WHEREFORE, Trainfill demands judgment regainst Shellenberger and there in an amount in excess of \$500,000,000, compensatory and printing damages, costs, fees, and interest.
end there in an amount in excess of \$500 000,00 compen-
estable and ninitive damages casts feet and interest
Shirt of the second state of the second state of the second secon
V. Statement of Claims-Mental Health
V. STATEMENT OF CHAINS TREATED AS TREATED
. 67. Between September 2018 and September 2019, Plaintif bad
suffered from extreme maxiety and trouma-related fear
Com being ambushed and shot anitiple times in soil
up clase tanger
Sitement sidt mont fellasm baracess saved Atlaialla Ed
event which he new suffers from post transactic stars,
-deall noisessyste their essteil since, aimore
luar startnessies et ptilideni ent connectation exce
strying to binself trying to avoid large crowds
badine org zi od, nocing ni ton ci Hitniall slidd. Pd
Rop JOSTA , plaina 20 200stance at teast at xADAK
. Pipriozni
70. However Dr. Taylor Dr. Fowler Dr. Reynolds, And Dr. Lisce,
habregarded with suitables a con boa, pliculinhoi
Constance rate soft xonak paided to proteid ving sin
beint planitaristin Lan, and ibana delpena tried
2. 23 test poilesibone sixteridayed Ditainell sing at
(A) didn't wark at all.
cases of solitons from the
(1) coused Plaintiff to feel disconnected from himself.
prujai trand a Pitaial Pozuas (1)
71. On October 1, 2018, Reynolds did a bridge order without
Plaintiffs bacilledge or consent for an order for Pame-
of primating nothernoon because of primary
its color shape, or side-effects
72. Plaintiff, for two whole weeks, withouringly took the
Pamelor mistoring the medication for either a generic
pain or antibiotic medication for his infected
teeth.
73.00 October 11, 2018, Fewler discontinued the prescription
Car Panela because on ENG report showed that the
trand Attainly non various soieus sam voitestasm
medication was causing injury upon Plaintiffs beart. 39. When Fowler discontinued the Pamelor, on the same day,
Plaintiff asked him Ger the name of the psychiatrist
Bad returned deinly mid to Bedires and the
declined to Answer attempting to cover up Being 19

Acts and for consissions as a foresaid
East, teamer Etilial to July 7015, 705, 75 request, had
discontinued also the personiption for Buspicone as
apisted Alin stanton stac less too bib Ditaina
medications in which populations were wing is
Asing ea estenci paca, deseres Istosaires xx sitosire
Joe From September 2018, three september 2019, Plainty and
so sumerous occasions, requested to be given hannx
to Alleviate his severe episodes consed by prior
-costing plantens and didne in charact
Las Institution 2 sear, colonged properly refused TI.
- orgligent representations as a why they wouldn't pre-
SCOVE XAGAX:
tala teas ti (A)
(B) highly Addictive
Destadue Bellisters (2)
(1) capable of being sold in prison
pairedles 101 alt at contradiction to the 101 allowing
Substance to be presented to innates, which is also
Lollentinos boseed baigo as sultaibbe played , pitzos
nozing ni bloz zyawla zi kna, sznatzdua
79. This practice of allowing Essence in the prison for
people suffering from a pied Abuse has A disparate in-
- reall point soul soll rather to the threatening iloses -
es for eiter Ang or neath conditions.
so. Mere white Americans have died from apied abuse than
any other tace especially in the Kensington area of
Philadelphia and other areas that are predominately
. Ill soft in boundle 21 scoxcale & poles si sint stille
81. When the crack cocaine epidernic began to scatter and
Challe prieses estant to estimummes thatid att sugala
to die at an alarming rate, when coming to prison, they
trantast laises any special trantment.
bedixent top de strains in the substants get prexibed
To Enot garge HA stainellA at amond is didu, xAAAX
Baxiety, dasawaid, and PTSD.
suitanimisseib tontald ban, tosutant stangeib eit at sid . Es
practice, Taylor, Fowler, Beynolds, and Lisco, intentionally
, XAMAX TO LEGIPST EPITAIAL PRINCE LIES FOR XAMAX.
causing Plaintiff to suffer from mental terture on A
daily basis for oner A year

84. By Taylor Foculer Reynolds, and Lisco Cailing to consider
84. By Taylor, Foculer, Reyards, and Lisce Cailing to consider the dispersie treatment as abovesseid; and paress on the
Each that Plaintiff was prescribed KARAY in the com.
-st transford Pictoial Resurged enderson't book petinenn
monstrates a departure Com accepted standards of care.
Count One-Prison Policy
Es Plaintil incorporates by reference the statements made in
facegraphs 1-84 As though set for the berein At length.
St. wher policy 1. E. W. J. the gilly in regards to
behavior health evaluations, is been and sabject to
the Commonwealth of Pennsylvania Mental Health Succeedings
Act and CAN) regulations promulgated thereinder A
psychiatrist, ourse practitioner or livered clinical psych.
without rounded with and betanging so line terpois
care provider to (ASSIVE) that each inmate prienes eval-
3 of tadt but to A sit rabac to sortes to bud not so
(responsibilities) to the inmate, as defined by the Act,
Are decharged appropriately"
Printe Attained prises asker consing Plaint An injury
when his heart, by howler and laylor trains to cover it
up; And by Boyrelds, Familes, Taylor, and Lisco denying
Plaintill XARAX to Alleviate his synotones town PTSU.
this demonstrates a lear violations of the prison policy.
88. The preximate cause of the Aterementioned Acts and emission
cored Baintit wental texter insomnia, anxiety, mental
Anguish nervousness, and an abacronal beart condition.
Spiral James Transfer Lunant Spiral S
Lisea, and towler in an amount in excess at 500,000,00,
WHEREFIRE, Plaintil demands judgment against Toylor, Regards, lisea, and Famer in an amount in excess of 500,000,00, compensation and punitive damages, costs, fee, interest.
Count Two-Pa. Admin. Code-Mental Health Procedures Act
Health Procedures Act
89. Plaintiff incorporates by reference the statements made in
PATAGRAPHS 1-88 MS though set forth berein at leagth.
30. luciont to Title 50 Pa CS. Ann. Section 7104, "treatment"is
defined as diagnosis, evaluation, therapy or rehabilitation
seeded to ellewate pain and distress and to facilitate
the receivery of a person from mental illness. "Adminte
Treatment" is a course of treatment designed and adminis

Ferel to calleciate a persons pain and distress and to
latoren was province of to phitalesis of serioran
illness.
October A si begaza a change bad society of the former of the former of the second of
Cominger Pitaled priving to bus transferst of any 20 20 for and the contract of the contract o
habitates ment established conscious box too established
. 292290HI letoson Atim claibinbai politoset in wal
Wherefore, Raintit Semands Judgment against sould Deterdants
in an amount in excess of 5 500, acour, compressions, and
positive damages, costs, fees, and intresta
- Count Three-First Amendment Retaliation
93 Plaintiff incorporates by reference parriagraphs 1-92 as if
Gully set Erth Nereins
94. Plaintiff has filed numerous prison grievances, as well as lawsty against mental health employees, that
HS THE SUITS HOAMS MENTAL BEALTY SINDLEYES, THAT
were colleagues of named Detendants.
95. In retaliation of the Aforesaid protected speech All
camed Defendants disternated Plaintiffs mental
illnesses and left him to suffer.
WHEREFORE, Plaintiff demands judgment against beforeants Taylor, Fawler, Reynolds and Lisco in an amount in excess
C & The court of costs for and short
of 's soo, our or, costs, fees, and introst.
Court For - Soveland August
Count Four - Fourteath Amendment
Due Process - Equal Protection Talle VII of the Civil Right Act of 1969
THE IN I THE CHILD SHE TO THE
The Bantiff in corporates by reference the statements in para-
areal of 1-95 as they set for the herein
Time a firmer bas , DETA, pt sixas & Fitaint , Emzeros and increment
are serious mental issues that named be Endant bad continuously failed to treat.
Tow and chinal letroneing to Ridolg 27 Holall . 89
considered when being devised Kanax.
190 - Other involes were presided controlled substances that
Text xount see a server a service of the service of
19616 of Co/cz
who distributed is a transfer of some standard of the source of the sour
- Belle Hill His market and the first the second of the se

- Zizad pliab A montally on a Daily basis			
INTEREFORE, Plainte Bennade Judgment Against mental			
wealth beforehomes in an amount in excess of 5500, crosco			
compensating and punitive damages, costs, Ges, and			
interest.			
Thereby verify under penalty of perjury that the bregoing is true			
perjuly that the Grecome is true			
and correct.			
9-22-19			
/ hales lalber			
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Charles Talbert CFD 3 A 2010	PLEDD
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Phila. PA. 19136	september day anti
United States District CourT	
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Charles TAlbert of Pennsylvania	- 12 18-11 72-11114
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Dr. Schneider, etal To Conform	W 10 COST CEGEL
9 9 1. 1. C (1) T 11	T \ 2\ 2\ 2\ 2\ 2\ 2\ 2\ 2\ 2\ 2\ 2\ 2\ 2
Rese Plaintiff, Charles Tall	
Honorable Court for permission	
his "Final Amended Complaint" e	HACKED NETERD SO THAL
his pleadings will conform to Are dated September 16th and	LAM STADAL ELTUAL SAT
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complaint and enrended comple	
the record to allow the Final	
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